

**EXHIBIT 2**

**Kapaloski, Tammy**

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**From:** Kapaloski, Tammy  
**Sent:** Monday, July 14, 2025 4:49 PM  
**To:** 'Ryan Pamplin'; Claire Hagan Eller  
**Cc:** Alejandra P. Perez; Foster, Brett; ghofmann@cohnekinghorn.com; ktunacik@ck.law; Lucy Jewett Wheatley; Miller, Mark; Stucki, Sherri; Jessica S. Maupin; Jillian Michelle Powell; Kyle S. Smith  
**Subject:** RE: Documents Produced by BlendJet in Blendtec Inc. v. BlendJet Inc., 2:21-cv-00668 (D. Utah)

Mr. Pamplin,

If you claim to be asserting the privilege on behalf of Blendjet, please provide us with your authority for doing so, including your current title and position with Blendjet. In addition, please identify the lawyers that are representing Blendjet. We were not aware that Blendjet is represented. In fact, in your April 30, 2025, email to us, you stated that "Blendjet is presently unrepresented by counsel and therefore cannot make any representations to the Court." No lawyers have entered an appearance on behalf of Blendjet in the 2025 Action, and new counsel failed to enter a notice of appearance in the 2021 action despite the Court's Order requiring the same. See 2021 Action at ECF No. 209. If Blendjet's lawyers intend to assert the privilege on behalf of Blendjet, please let us know when they will file a notice of appearance in the 2025 Action. See DUCivR 83-1.3 ("A corporation, association, partnership, or other artificial entity must be represented by an attorney who is admitted under DUCivR 83-1.1.").

Regards,  
Tammy

**From:** Ryan Pamplin <ryan@blendjet.com>  
**Sent:** Monday, July 14, 2025 1:58 PM  
**To:** Claire Hagan Eller <CEller@mcguirewoods.com>  
**Cc:** Alejandra P. Perez <APerez@mcguirewoods.com>; Foster, Brett <foster.brett@dorsey.com>; ghofmann@cohnekinghorn.com; Kapaloski, Tammy <kapaloski.tammy@dorsey.com>; ktunacik@ck.law; Lucy Jewett Wheatley <LWheatley@mcguirewoods.com>; Miller, Mark <miller.mark@dorsey.com>; Stucki, Sherri <stucki.sherri@dorsey.com>; Jessica S. Maupin <jmaupin@mcguirewoods.com>; Jillian Michelle Powell <JPowell@mcguirewoods.com>; Kyle S. Smith <ksmith@mcguirewoods.com>  
**Subject:** Re: Documents Produced by BlendJet in Blendtec Inc. v. BlendJet Inc., 2:21-cv-00668 (D. Utah)

EXTERNAL FROM OUTSIDE DORSEY. BE CAUTIOUS OF LINKS AND ATTACHMENTS.

Hi Lucy,

I am surprised to hear that Blendtec filed BlendJet documents containing information that may be protected by the attorney-client privilege, common interest privilege, and/or the work product doctrine. The exhibits attached to your letter do appear to be privileged, and I would like the parties to withdraw these and any similar documents in their possession while I take steps to confer with my attorneys about whether they are subject to any privilege.

Thank you.



**@blendjet**

**Ryan Pamplin**

Co-Founder



646-221-6685



Sent via [Superhuman](#)

On Wed, Jul 09, 2025 at 7:10 PM, Claire Hagan Eller <[CEller@mcguirewoods.com](mailto:CEller@mcguirewoods.com)> wrote:

Mr. Pamplin,

Please find attached correspondence from Lucy Jewett Wheatley.

The attachments to this letter are being sent via ShareFile due to their size, and are available at the link below. Please let us know if you have any trouble accessing those documents.

Link: <https://mcguirewoods.sharefile.com/d-se8e075e070bd4fbc9883737aad9d617>

Regards,

Claire Eller

**Claire Hagan Eller**

Counsel

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## McGuireWoods

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